

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 89-018

SITE CLEANUP REQUIREMENTS FOR:

VAN WATERS & ROGERS INC.
JUNCTION AVENUE FACILITY
SAN JOSE, SANTA CLARA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region, (hereinafter called the Board) finds that:

1. Van Waters & Rogers Inc., a wholly owned subsidiary of Univar Corp., hereinafter called the discharger, owns and operates a chemical blending, storage, and distribution facility on a site of approximately 13.7 acres located at 2256 Junction Avenue in San Jose, Santa Clara County.
2. The discharger constructed the facility in 1975. The facility contains 37 underground storage tanks, of 6,000 and 10,000 gallon capacities. Two tanks have been taken out of service because of leaks and are now kept empty. The discharger presently uses, or has used in the past, 36 of the tanks to store the following industrial chemicals: 1,1,1-trichloroethane, methylene chloride, tetrachloroethene, selected aliphatic hydrocarbons, aromatic hydrocarbons (including xylene and toluene), ketones, glycols, and alcohols. One tank is used to store diesel fuel.
3. Subsurface investigations initiated at the site in December 1982 have revealed the presence of various industrial chemicals in the soil and groundwater at the facility. These chemicals include 1,1,1-trichloroethane, trichloroethene (TCE), tetrachloroethene (PCE), 1,1-dichloroethane (DCA), 1,1 and 1,2 dichloroethenes (DCE), methylene chloride, vinyl chloride, toluene, xylene, ketones, and alcohols. The highest concentrations are located in the vicinity of the underground tank farm. A November 1988 sample of a well in this area contained 13 ppm TCE, 76 ppm PCE, 9.4 ppm 1,1-DCE, and 0.68 ppm 1,1-DCA. The contaminants are believed to be the result of spillage, inadequate chemical handling practices, and possibly leakage from underground tanks and piping. The discharger has changed their chemical handling practices since discovery of the problem.
4. The discharger has nearly completed delineation of the extent of the plume. The plume extends to a depth of approximately 80 feet, and is about 500 feet wide and about 500 to 800 feet in length. The area that has not been fully delineated is the northern/downgradient area.
5. The discharger initiated an interim groundwater remediation program at the site in December 1986. At the present time, the program involves extraction of groundwater from six wells followed by treatment of the extracted groundwater by an air stripping unit and a bio-oxidation unit prior to discharge to Guadalupe River via the storm drain system. This discharge is regulated by an NPDES permit issued by the Board in February

1987. The program has been successful in decreasing the concentration of contaminants in the groundwater at the facility.

6. This facility is listed on the Environmental Protection Agency's National Priority List. As a result, the discharger was requested to submit and has submitted an acceptable Work Plan for Remedial Investigation/Feasibility Study dated December 8, 1988. The Work Plan includes description of tasks to complete delineation of the extent of the contaminants, and to generate and compile data to allow evaluation of remedial action alternatives.
7. One limitation of the Work Plan, and the investigative work thus far, is the lack of delineation of contaminants in the area beneath and immediately around the underground tanks. The reason for this is that the tanks and piping prevent investigation within this area. In the interest of not delaying work toward final remediation of the rest of the facility, the Board will postpone further subsurface investigation and remediation of the tank farm area until such time as access to this area is available. The conditions of this postponement are 1) that this will not result in further spread of the contaminants from this area, and 2) that the discharger show through compliance with applicable underground tank regulations that the tanks themselves are not and will not become a source of contaminants. This Order requires the discharger to submit a time schedule for obtaining access to the tank farm area soils.
8. On July 17, 1985, the Board adopted Order No. 85-87 prescribing Waste Discharge Requirements to the discharger. Order No. 85-87 established tasks and time schedules to define the extent of the contaminants and implement interim remedial action. The intent of this Order is to supersede the requirements of Order No. 85-87 by updating the status of the site and prescribing a time schedule to complete final investigations and evaluation of final remedial actions alternatives (with the exception of the tank farm area), and in so doing, approve the Work Plan referenced in Finding 6, above.
9. The Board adopted a revised Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) on December 17, 1986. The Basin Plan contains water quality objectives and beneficial uses for South San Francisco Bay and contiguous surface and ground waters.
10. The existing and potential beneficial uses of the groundwater underlying and adjacent to the facility include:
 - a. Municipal and Domestic Supply
 - b. Industrial Process Supply
 - c. Industrial Service Supply
 - d. Agricultural Supply
11. The discharger has caused or permitted, and threatens to cause or permit waste to be discharged or deposited where it is or probably will be discharged to waters of the State and creates or threatens to create a condition of pollution or nuisance.

12. This action is an order to enforce the laws and regulations administered by the Board. This action is categorically exempt from the provisions of the CEQA pursuant to Section 15321, Title 14, California Code of Regulations.
13. The Board has notified the discharger and interested agencies and persons of its intent under California Water Code Section 13304 to prescribe Site Cleanup Requirements for the discharge and has provided them with the opportunity for a public hearing and an opportunity to submit their written views and recommendations.
14. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED, pursuant to Section 13304 of the California Water Code, that the discharger shall cleanup and abate the effects described in the above findings as follows:

A. PROHIBITIONS

1. The discharge of wastes or hazardous materials in a manner which will degrade water quality or adversely affect the beneficial uses of the waters of the State is prohibited.
2. Further significant migration of pollutants through subsurface transport to waters of the State is prohibited.
3. Activities associated with the subsurface investigation and cleanup which will cause significant adverse migration of pollutants are prohibited.

B. SPECIFICATIONS

1. The storage, handling, treatment or disposal of soil or groundwater containing pollutants shall not create a nuisance as defined in Section 13050(m) of the California Water Code.
2. The discharger shall conduct monitoring activities as needed to define the current local hydrogeologic conditions, and the lateral and vertical extent of soil and groundwater pollution. Should monitoring results show evidence of plume migration, additional plume characterizations of pollutant extent may be required.
3. Testing, usage, and renovation or replacement of the solvent storage distribution system shall be in accordance with state laws and the city or county ordinances which regulate the underground storage of hazardous materials.

C. PROVISIONS

1. The discharger shall submit to the Board acceptable monitoring program reports containing results of work performed according to a program as attached and as may be amended by the Board's Executive Officer.
2. The discharger shall comply with Prohibitions A.1, A.2, and A.3, and Specifications B.1 and B.2 immediately except as modified in accordance with the following tasks and time schedule:

a. TASK: REPORT OF SOIL DATA

Submit a technical report acceptable to the Executive Officer containing the results of the soil borings work proposed in Section 5.2 (except 5.2.4) RI/FS Work Plan. This report shall include at a minimum lithologic logs for each boring, soil chemical analyses results, isoconcentration maps, and summary tables.

COMPLETION DATE: April 1, 1989

- b. TASK: DETAILED PROPOSAL FOR MONITORING OF UNDERGROUND TANKS
Submit a detailed proposal acceptable to the Executive Officer
1) expanding upon Section 5.2.4 of the RI/FS Work Plan for integrity testing of the tanks, and 2) describing long term monitoring plans for the underground storage tanks at the facility. This proposal shall be prepared in accordance with the underground storage tank regulations and laws applicable to this facility.

COMPLETION DATE: April 1, 1989

c. TASK: PROPOSAL FOR TREATABILITY STUDIES

Submit a detailed proposal for conducting tests to evaluate the feasibility of remedial technologies. This is the plan called for in Section 6.2 of the RI/FS Work Plan dated December 8, 1988.

COMPLETION DATE: June 1, 1989

d. TASK: RESULTS OF UNDERGROUND TANK TESTING

Submit a technical report acceptable to the Executive Officer presenting the results of the underground tank testing performed in accordance with first part of the proposal submitted pursuant to Provision C.2.b.

COMPLETION DATE: June 1, 1989.

- e. TASK: SCHEDULE AND PLAN FOR OBTAINING ACCESS TO TANK FARM AREA
Submit a proposed plan and time schedule acceptable to the Executive Officer for obtaining access to the area beneath the tank farm for monitoring purposes and corrective action of soils and groundwater.

COMPLETION DATE: July 1, 1989

- f. TASK: DRAFT REMEDIAL INVESTIGATION REPORT
Submit a Remedial Investigation Report in accordance with the approved RI/FS Work Plan dated December 8, 1988.

COMPLETION DATE: September 1, 1989

- g. TASK: DRAFT FEASIBILITY STUDY
Submit a Feasibility Study in accordance with the approved RI/FS Work Plan dated December 8, 1988.

COMPLETION DATE: January 1, 1990

- h. TASK: DRAFT PROPOSED PLAN
Submit a Proposed Plan which highlights key aspects of the RI/FS report, provides a brief analysis of remedial alternatives under consideration, and identifies the preferred alternative. This Proposed Plan should be prepared in fact sheet format.

COMPLETION DATE: January 1, 1990

- i. TASK: FINAL REMEDIAL INVESTIGATION/FEASIBILITY STUDY REPORT
Submit a final Remedial Investigation/Feasibility Study report and Proposed Plan acceptable to the Executive Officer.

COMPLETION DATE: June 1, 1990

3. The submittal of technical reports evaluating interim and final remedial measures will include a projection of the cost, effectiveness, benefits, and impact on public health, welfare, and environment of each alternative measure. The remedial investigation and feasibility study shall consider the guidance provided by Subpart F of the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR Part 300); Section 25356.1 (c) of the California Health and Safety Code; CERCLA guidance documents with reference to Remedial Investigation, Feasibility Studies, and Removal Actions; and the State Water Resources Control Board's Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California."
4. The discharger shall provide documentation and assistance as necessary, according to requirements to be specified by the Executive Officer, for the purposes of data validation and completion of the baseline public health evaluation.
5. Technical reports on compliance with the Prohibitions, Specifications, and Provisions of the Order shall be submitted monthly to the Board. These reports are due on the last day of the following month, commencing on February 28, 1989. On a monthly basis thereafter until successful completion of Provision C.2.i, these reports shall consist of a letter report that, (1) summarizes work completed since submittal of the previous report, and work projected to be completed by the time of the next report, (2) identifies any obstacles which may threaten compliance with the schedule of this

Order and what actions are being taken to overcome these obstacles, and (3) includes, in the event of non-compliance with Provision C.2. or any other Specification or Provision of the Order, written notification which clarifies the reasons for non-compliance and which proposes specific measures and a schedule to achieve compliance. This written notification shall identify work not completed that was projected for completion, and shall identify the impact of non-compliance on achieving compliance with the remaining requirements of this Order.

6. On a quarterly basis, technical monitoring reports on compliance with the Prohibitions, Specifications and Provisions of the Order shall be submitted to the Board commencing on April 30, 1989. These reports shall evaluate the adequacy of plume containment measures to prevent further significant migrations of pollutants and to achieve the removal of pollutants from the groundwater to meet cleanup objectives. Such evaluations shall include an estimation of the depression by field measurements, and presentation of chemical monitoring data from monitoring wells. Specific corrective measures shall be proposed in the event of non-compliance with plume containment and cleanup objectives.
7. All hydrogeological plans, specifications, reports, and documents shall be signed by or stamped with the seal of a registered geologist, engineering geologist or professional engineer.
8. All samples shall be analyzed by State certified laboratories or laboratories accepted by the Board using approved EPA methods for the type of analysis to be performed. All laboratories shall maintain quality assurance/quality control records for Board review.
9. The discharger shall maintain in good working order, and operate, as efficiently as possible, any facility or control system installed to achieve compliance with the requirements of this Order.
10. Three copies of all correspondence, reports, and documents pertaining to compliance with the Prohibitions, Specifications, and Provisions of this Order, shall be provided to the Board.
11. Copies of all correspondence, reports, and documents pertaining to compliance with the Prohibitions, Specifications, and Provisions of the Order, shall be provided to the following agencies:
 - a. State Department of Health Services/TSCD
 - b. U.S. Environmental Protection Agency, Region IX
12. Copies of reports and documents specified in Provision C.2 of this Order, shall be provided to the following agencies:
 - a. Santa Clara Valley Water District
 - b. Santa Clara County Health Department
 - c. City of San Jose

13. The discharger shall permit the Board or its authorized representative, in accordance with Section 13267(c) of the California Water Code:
- a. Entry upon premises in which any pollution sources exist, or may potentially exist, or in which any required records are kept, which are relevant to this Order.
 - b. Access to copy any records required to be kept under the terms and conditions of this Order.
 - c. Inspection of any monitoring equipment or methodology implemented in response to this Order.
 - d. Sampling of any groundwater or soil which is accessible, or may become accessible, as part of any investigation or remedial action program undertaken by the discharger.
14. The discharger shall file a report on any changes in site occupancy and ownership associated with the facility described in the Order.
15. If any hazardous substance is discharged in or on any waters of the State, or discharged and deposited where it is, or probably will be discharged in or on any waters of the State, the discharger shall report such discharge to this Regional Board, at (415) 464-1255 on weekdays during office hours from 8 a.m. to 5 p.m., and to the Office of Emergency Services at (800) 852-7550 during non-business hours. A written report shall be filed with the Regional Board within five (5) working days and shall contain information relative to: the nature of waste or pollutant, quantity involved, duration of incident, cause of spill, Spill Prevention, Control, and Countermeasure Plan (SPCC) in effect, if any, estimated size of affected area, nature of effects, corrective measures that have been taken or planned, and a schedule of these activities, and persons/agencies notified.
16. Order No. 85-87 is hereby rescinded.
17. The Board will review this Order periodically and may revise the requirements when necessary.

I, Steven R. Ritchie, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on January 18, 1989.


STEVEN R. RITCHIE
Executive Officer

Attachments:
Site Map
Self-Monitoring Program

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM

FOR

VAN WATERS & ROGERS INC.
2256 JUNCTION AVENUE FACILITY
SAN JOSE, SANTA CLARA COUNTY

ORDER NO. 89-018

CONSISTS OF

PART A - dated December 1986 and modified January 1987.

PART B - Adopted on January 18, 1989

PART B

VAN WATERS & ROGERS INC.
2256 JUNCTION AVENUE FACILITY
SAN JOSE, SANTA CLARA COUNTY

I. DESCRIPTION OF SAMPLING STATIONS

<u>Station</u>	<u>Description</u>
11, 14, 17, 24, 25 32, 33, 34, 39, 40	Groundwater Monitoring Wells shallow zone
1, 2, 3, 9, 10, 12, 13, 28 4, 5, 8	shallow zone upgradient/peripheral shallow zone
7, 20, 21, 26, 27, 35 36, 37, 38, 41, 42	deep zone
6, 15, 16, 30, 31 29	Groundwater Extraction Wells shallow zone deep zone

II. SCHEDULE OF SAMPLING AND ANALYSIS

The schedule for sampling, measurements, and analysis shall be that given in Table I (attached).


III. MODIFICATIONS TO PART A

- A. Delete: Section C - 2, 3, 4, 5 through 9
Section D - all
Section E - all
Section F - 1.d., 2, and 3
Section G - 2, 4.a.1) through 4.a.4), 4.b., 4.d.2), 4.d.3),
4.e, 4.f, and 4.g.
- B. Modify:
1. Section C.1 - Delete last sentence which begins "Grab samples represent ..."
 2. Section F.1 - First sentence is amended to read "Written reports, strip charts, calibration and maintenance records, field logs, and other records shall be maintained and accessible, and retained for a minimum of ten years."
 3. Section G.4 - Self-Monitoring reports shall be filed regularly for each calendar quarter, and filed no later than the 30th day of the month following the quarter (January, April, July, and October).

4. Section G.4.a - Fourth sentence is amended to read "The letter transmitting the reports shall be signed by the principal executive officer or ranking elected official of the discharger, or by a duly authorized representative of that person."
5. Section G.4.d - First sentence is amended to read "This shall consist of tabulations of the results from each required analysis specified in Part B by date, detection limit and station."
6. Section G.4.d.4) - Amend to read "Lab results shall be copied and submitted as an appendix to the regular report. They shall be signed by the laboratory director."
7. Section G.5 - First sentence is amended to read "Beginning in 1990, by January 31, of each year, the discharger shall submit an annual report to the Regional Board covering the previous calendar year."

I, Steven R. Ritchie, Executive Officer, hereby certify that the foregoing Self-Monitoring Program:

1. has been developed in accordance with the procedure set forth in this Regional Board's Resolution No. 73-16 in order to obtain data and document compliance with site cleanup requirements established in Regional Board Order No. 89-018,
2. was adopted by the Board on January 18, 1989, and
3. may be reviewed at any time subsequent to the effective date upon written notice from the Executive Officer or request from the discharger and revisions will be ordered by the Executive Officer or Regional Board.


STEVEN R. RITCHIE
Executive Officer

Attachment: Table I - Schedule for Sampling, Measurements, and Analysis

TABLE I

SCHEDULE FOR SAMPLING, MEASUREMENT, AND ANALYSIS

SAMPLING STATION	11, 14, 17, 24 25, 32, 33, 34 39, 40	1, 2, 3, 9 10, 12, 13 28	4 5 8	7, 20, 21 26, 27, 35 36, 37, 38 41, 42	6, 15, 16 30, 31 29
TYPE OF SAMPLE	G	G	G	G	G
EC, pH	Q	2/Y	Y	Q	Q
EPA METHODS 8010 & 8020	Q(1)	2/Y	(2) 2Y	Q(1)	Q(1)
EPA METHOD 8240	Y(1)	Y(1)	(2) 2Y	Y(1)	Y(1)
WATER LEVEL	Q	Q	Q	Q	Q

Notes: (1) The required yearly analysis using EPA Method 8240 may be performed in lieu of one of the required analyses using EPA Methods 8010 and 8020.

(2) The required analyses using EPA Methods 8010 and 8020 shall alternate annually with the required analysis using EPA Method 8240.

Legend for Table

G = Grab Sample
 Q = Quarterly, once in February, May, August, and November
 2/Y = Twice per year, in May and November
 Y = Yearly
 2Y = Once in two years (i.e. every other year)